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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED
07 DEC 26 AM 11: 25

UNITED STATES OF AMERICA, Plaintiff, v. **Ryan Dean THURLOW,** Defendant(s)	Magistrate Case No. '07 MJ 2964
	COMPLAINT FOR VIOLATION OF:
	Title 8 U.S.C., Sec. 1324 (a)(1)(A)(ii) Transportation of Illegal Aliens

The undersigned complainant, being duly sworn, states:

On or about **December 22, 2007,** within the Southern District of California, defendant **Ryan Dean THURLOW** with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Francisca Guadelupe OLIVA-Gonzalez, Liliana PONCE-Dominguez,** and **T.P.D(a juvenile)** had come to, entered and remained in the United States in violation of law, did transport and move, said aliens within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT
James Trombley
Senior Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **26th** DAY OF **DECEMBER, 2007.**

Leo S. Papas
UNITED STATES MAGISTRATE JUDGE

CONTINUATION OF COMPLAINT:
Ryan Dean THURLOW

PROBABLE CAUSE STATEMENT

I declare under the penalty of perjury that the following statement is true and correct:

Furthermore, the complainant states that **Francisca Guadelupe OLIVA-Gonzalez, Liliana PONCE-Dominguez,** and **T.P.D(a juvenile)** are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On December 22, 2007, at approximately 12:50 p.m., Supervisory Border Patrol Agent K. Krall, received a radio transmission from San Diego Sector Communications regarding a California Highway Patrol (CHP) Officer who was requesting Border Patrol assistance on a traffic stop. The traffic stop was located just north of the intersection of State Route 67 and Johnson Lake Road. Border Patrol Agent (BPA) Stephen P. Hall and Agent Krall responded from the El Cajon Station.

Upon arrival, Officer D. Vinyard and Officer H. Garrow informed Agent Krall that the reason they stopped the driver, identified as the defendant **Ryan Dean THURLOW**, was driving approximately 76 miles an hour in a 55 mile an hour zone, southbound on State Route 67. Due to defendant's excessive speed, Officer Vinyard conducted a vehicle stop on defendant's vehicle, a Grey 2007 Nissan Altima bearing California plate.

When Officer Vinyard approached the vehicle, he observed a single male driver and three passengers. Officer Vinyard stated that the driver (the defendant) had a suspended driver's license, so he called for a tow. During the subsequent vehicle inspection, Officer Garrow discovered two more individuals inside the trunk. Officer Vinyard subsequently contacted the United States Border Patrol, via his dispatch.

At approximately 1:05 p.m., Agents Hall and Krall arrived on scene. After Officer Vinyard informed Agent Krall of the situation, Agent Krall approached Officer Garrow's CHP vehicle. Krall immediately recognized the defendant as a known smuggler in the El Cajon Border Patrol Station's area of responsibility.

Meanwhile, Agent Hall approached five individuals handcuffed on the side of the road, and identified himself as a United States Border Patrol Agent. Agent Hall questioned the five individuals regarding their citizenship and nationality. All five individuals stated that they were citizens and nationals of Mexico. Agent Hall questioned the five individuals regarding any immigration documents they might have. All five individuals stated that they did not have any immigration documents allowing them to enter or remain in the United States legally. The Five smuggled aliens and the defendant were arrested and transported to the El Cajon Station for processing.

DEFENDANT STATEMENT:

The defendant stated that a friend, named Matt, dropped him off at the intersection of Potrero Valley Road and Highway 94 in order to smuggle five illegal aliens. The defendant said that these five illegal aliens would be waiting inside of a Nissan Altima, which was parked on the side of the road.

The defendant stated that he made all smuggling arrangements with a Caucasian male who goes by the name of Michael. The defendant said that he originally met Michael at a night club named "Mystery's", which is located in Tijuana, Baja California, Mexico. The defendant also said that he has smuggled illegal aliens in the past for Michael. He stated that he made smuggling arrangements in person at the club or by cellular phone.

CONTINUATION OF COMPLAINT:
Ryan Dean THURLOW

The defendant stated that Michael paid his rent of $500.00 as payment for the smuggling of the five Illegal Aliens. The defendant said that Michael rents vehicles from Enterprise Rental Company when smuggling illegal aliens. The defendant stated that Michael lives near Albertson's grocery store located on Jamacha Road in Spring Valley, California.

MATERIAL WITNESSES STATEMENTS:

Material Witnesses **Francisca Guadelupe OLIVA-Gonzalez, Liliana PONCE-Dominguez, T.P.D (a juvenile)** stated that they are citizens and nationals of Mexico illegally present in the United States. They stated that they did not have any immigration documents allowing them to be in the United States legally. They stated that arrangements had been made in Baja California, Mexico to be smuggled into the United States. All the material witnesses stated that they were to pay between an unknown amount to $2,000.00 U.S. dollars to be smuggled to Los Angeles, California. When shown a photographic lineup, Material Witnesses **Guadelupe OLIVA-Gonzalez, Liliana PONCE-Dominguez, T.P.D (a juvenile)** were able to identify the defendant as the driver of the vehicle.

Executed on December 23, 2007, at 10:10 a.m.

Raul Castorena
Senior Patrol Agent

On the basis of the facts presented in the probable cause statement consisting of **2** page(s), I find probable cause to believe that the defendant named in this probable cause statement committed the offense on **December 22, 2007**, in violation of Title **8**, United States Code, Section **1324**.

Leo S. Papas
United States Magistrate Judge

12/23/07 - 10:30 Am
Date/Time